

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	Cause No. 4:19-cr-01043-RLW-PLC-1
)	
)	
MAURICE MADISON,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO AMEND CONDITIONS OF BOND

COMES NOW, Mark J. Byrne, Attorney for Defendant, and respectfully requests that the conditions of bond be amended in the above matter to remove the requirement of electronic monitoring. As grounds for this request, Counsel states as follows:

- 1) Defendant has been released on bond subject to electronic monitoring since December 20, 2019.
- 2) Defendant represents to Counsel that he has not had any violations related to his bond since December 20, 2019.
- 3) Counsel is unaware of any violations of Defendant’s bond conditions over that same period of time.
- 4) Additionally, pursuant to the Bail Report prepared by U.S. Pretrial Services, Defendant has no prior history of felony or misdemeanor convictions.

WHEREFORE, for the foregoing reasons, Counsel respectfully requests that this Honorable Court grant Defendant's request, along with any other relief this Court deems proper.

Respectfully Submitted,

FISCHER & BYRNE, L.L.C.

/s/ Mark J. Byrne

MARK J. BYRNE, Fed No. 114928

Attorney for Defendant

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CERTIFICATE OF SERVICE

The above-signed document was filed via-electronic filing to the United States District Court of Eastern Missouri on this 30th day of April, 2020.